

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway, Suite 207, Roseland, NJ 07068

Phone: (973) 228-9898 - Fax: (973) 228-0303

www.mazieslater.com

David A. Mazie*
Adam M. Slater*^o
Eric D. Katz*^o
David M. Freeman
Beth G. Baldinger
Matthew R. Mendelsohn*^o
David M. Estes
Adam M. Epstein^o

Karen G. Kelsen^o
Cory J. Rothbort*^o
Michael R. Griffith^o
Christopher J. Geddis
Samuel G. Wildman
Julia S. Slater^o
Trevor D. Dickson

^oMember of N.J. & N.Y. Bars

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

November 28, 2022

VIA ECF

Honorable Robert Kugler, U.S.D.J.
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US
Courthouse
1 John F. Gerry Plaza, Courtroom 4D
4th and Cooper Streets
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower, Suite 1800
Philadelphia, Pennsylvania 19103-7360

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs in advance of the November 30, 2022 case management conference.

1. MSP's Motion to Seal Certain Portions of the Class Certification Briefing

MSP's briefing in support of its confidentiality designations to the exhibits to the class certification briefing is currently due on December 2, 2022. Counsel for MSP has been working with counsel for Defendants to narrow down the disputed issues; however, counsel for Defendants that was taking lead on the confidentiality designations has been out of the office due to the flu. For that reason, MSP requests additional time to meet and confer with Defense counsel to try and

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narrow the issues before the Court. MSP asks that the Court grant it until December 16, 2022, to file its initial brief, with Defendants' opposing brief due on January 6, 2023. Counsel for Defendants agree with the requested relief.

2. PFS Deficiencies and Orders to Show Cause

Plaintiffs will be prepared to address this issue during the case management conference.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)